Specific Comments

1. The proposed action is described in part as including item (2) forced evaporation of water collected by the interceptor trench system. Based on discussions between DOE, the Colorado Department of Health and EPA, this portion of the partial closure activities, including collection of ground water from the interceptor trench system, storage in holding tanks, and evaporation of the ground water using the flash evaporators, will be handled as an interim measure under the Interagency Agreement pending remedial investigation and final remedy selection and implementation for the solar ponds.

This is in addition to the change to interim status for the other items addressing the solar ponds themselves more directly, in particular the addition of dye, solar and flash evaporators to the effort to dewater and remove sludge from the solar ponds. It therefore appears that this EA is intended to include the activities to be undertaken as part of the interim action, subject to approval by both CDH and EPA pursuant to the terms of the IAG, as well as change to interim status activities which together fulfill partial closure requirements under RCRA and requirements of the AIP for the solar ponds.

Paragraph 4 of the introduction, states that a separate (singular) NEPA review will be performed for remediation of the solar ponds area, relative to a separate action under CERCLA (more appropriately CERCLA/RCRA coordinated through the IAG). As this is the case, all activities related to the items described above, should be sufficiently discussed in the context of this EA. If the ground water part of the partial closure is to be handled through provisions in the IAG for interim actions, this should be noted.

Additionally, the IAG provides for increased public involvement with regards to this portion of the proposed action. Discussion of the relationship to the IAG would allow the reader to investigate additional regulatory requirements covering these items. This is significant

in that the holding tanks, which have an obvious beneficial impact as do other components of the partial closure, also could have a negative impact should the integrity of the tanks be breached and contaminated water be released to Walnut Creek. Refer also to our comment No. 9.

Additionally, paragraph 5 states that this action would not preclude alternatives for the planned CERCLA removal and remedial action. As the ground water portion of the action will be handled as an interim measure under CERCLA, it is not clear what is meant by the reference to a planned CERCLA removal action.

2. Page 3, paragraph 1. A discussion of the Pond C characteristics and history is appropriate here as at least some of
the actions listed on page 1, in the introduction describing the proposed action, do involve Pond C (i.e. sludge removal). Also, there is water in Pond C that will not be evaporated, but still must be accounted for (i.e. will be used in the formation of pondcrete from Pond C). Paragraph 4 implies that all activities are being performed for all of the ponds as does paragraph 3 of the introduction on page 1. As Pond C is to be treated differently, this should be mentioned here. See also paragraph 1, Section 3.0 -Purpose.

Further investigation as part of RTO

3. Page 3, paragraph 5. As the ITS may not be adequately capturing contaminated alluvial ground water from the solar ponds area, reference should be made here to inclusion in a potential interim action or at at least further investigation as part of
CERCLA and RCRA corrective action activities.

fix RTO

4. Page 4, first paragraph. The reason for implementing the proposed action is also to allow scheduled characterization and investigation activities under the IAG to move forward.

5. Page 4, last paragraph, implies that dye is added to all ponds.
Page 6, paragraph 1 is the first time that it is apparent that some activities apply only to some of the ponds.

6. Page 6, Section 4.1.1.2 first sentence - incorporate the discussion of Pond C activities into the introduction and background somehow as well as here. The building 374 evaporator is currently used for treated process waste water as well as some water from the solar ponds, and will be augmented by the portable evaporators.

7. Page 6, Paragraph 2, Section 4.1.1.2. The EA specifies two 750,000 gallon holding tanks to receive water from the ITS system. temporary
Discussions with and information submitted to CDH indicate 3 ~~750,000~~ 380,000 gallon tanks are proposed. The EA should include the information based on the most current design information. If this is still subject to change, the range of options should be included, i.e. 2-4 tanks etc.

8. Page 8, last paragraph. The Nevada Test Site is also in the process of obtaining a RCRA permit from the state of Nevada.

9. Page 11, item 6.2, Water Quality. Measures to protect surface water from contamination present in ground water collected from the ITS system and temporarily stored in the proposed holding tanks should be discussed as well as potential impacts to surface water should the integrity of the tanks be compromised. What design features will help prevent this and what contingency measures are available?

10. Page 11, items 6.6 and 6.8. The reference to RCRA removal activities is confusing as these are described elsewhere in the EA as RCRA Partial Closure Activities. This is especially true, in view of the fact that there is a proposed NEPA categorical exclusion for certain removal actions under CERCLA and actions similar in scope for RCRA.